

# Exhibit 1

**Geyer, Kate**

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**From:** Randall Garteiser <rgarteiser@ghiplaw.com>  
**Sent:** Thursday, November 16, 2023 8:48 AM  
**To:** Geyer, Kate  
**Cc:** Damitio, Chris; chonea@ghiplaw.com; Machleidt, Dario  
**Subject:** Symbology Innovations, LLC v. Valve Corporation and Gearbox Software, EDTX  
**Attachments:** 2023\_11\_16 venue discovery re sym v valve edtx.docx; Corrected Exemplar of unopposed motion for venue discovery.pdf; Exemplar of unopposed motion for venue discovery.pdf

**\*\*CAUTION: External Email\*\***

Dear Ms. Geyer and additional Counsel for Valve Corp.,

Attached is a draft proposal for venue discovery crafted from other recent cases. This is a direct result of Valve's motion to dismiss based on Rule 30(b)(6).

A teleconference today or tomorrow is only required if your client does not agree with the approach used in this District when the parties disagree whether venue is proper or not. I've attached an exemplar we are using along with a Word version of the draft Plaintiff Symbology is requesting in this case from your client Valve Corporation.

In direct response to your letter, which we will craft a separate response to, just wanted to make sure your law firm is aware that in 2015 Valve Corporation already stated in a written settlement agreement that venue is proper in this district with respect to a prior patent licensing agreement involving Display Technologies, LLC (Case No. 2:15-cv-00999). So it is unclear why Valve believes suddenly venue is not proper here, when it has agreed to resolve disputes about that prior agreement here.

To be clear, Valve's standard operating procedure related to its Freedom to Operate without infringing patents of others is not at issue in the requested venue discovery.

So please let us know so we can proceed accordingly with filing the draft unopposed, or in the alternative, some times when you are available to discuss over the phone.

Be well,  
Randall Garteiser  
415.568.0553

On Nov 15, 2023, at 6:04 PM, Geyer, Kate <[KGeyer@kilpatricktownsend.com](mailto:KGeyer@kilpatricktownsend.com)> wrote:

Counsel,

Please see the attached letter.

Thank you,

Kate Geyer

[kgeyer@ktslaw.com](mailto:kgeyer@ktslaw.com)

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Kilpatrick Townsend & Stockton LLP

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**From:** Machleidt, Dario <[dmachleidt@kilpatricktownsend.com](mailto:dmachleidt@kilpatricktownsend.com)>

**Sent:** Monday, October 2, 2023 6:32 AM

**To:** [rgarteiser@ghiplaw.com](mailto:rgarteiser@ghiplaw.com)

**Cc:** Geyer, Kate <[KGeyer@kilpatricktownsend.com](mailto:KGeyer@kilpatricktownsend.com)>; Damitio, Chris <[CDamitio@kilpatricktownsend.com](mailto:CDamitio@kilpatricktownsend.com)>; chonea@ghiplaw.com; rgarteiser@ghiplaw.com

**Subject:** Rothschild entities v. Valve, EDTX

Counsel,

Please see the attached letter.

Sincerely,

<image001.gif>

**Dario Machleidt**

**Kilpatrick Townsend & Stockton LLP**

Suite 3700 | 1420 Fifth Avenue | Seattle, WA 98101

office 206 224 2857 | fax 206 374 2199

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' <2023-11-15 Ltr to Garteiser from Geyer.pdf>